

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. No. 17671

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On June 14, 2024, Ernst & Young LLP (“EY”) filed the *Second Interim Fee Application of Ernst & Young LLP* [D.I. 17671] (the “Interim Application”). Pursuant to the Interim Application, objections, if any, were to be filed and served no later than the objection deadline set forth in accordance with the Interim Compensation Order (as applicable, the “Objection Deadline”), which expired on July 5, 2024.

2. Pursuant to the Fee Examiner Order, on June 17, 2025, Katherine Stadler, (the “Fee Examiner”) filed the *Fee Examiner’s Summary Report on Interim and Final Fee Applications* [D.I. 30870] (the “Fee Examiner Report”) with respect to the fees and expenses requested in the Interim Application, recommending certain agreed-upon reductions.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

3. The undersigned hereby certifies that the Court's docket has been reviewed and no other answer, objection, or other responsive pleading to the Interim Application appear thereon.

4. A copy of the Proposed Order approving the Interim Application has been circulated to the Fee Examiner and the Office of the United States Trustee (together, the "Parties"). The Parties have advised that they do not object to entry of the Proposed Order.

5. In accordance with the Court's electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

WHEREFORE the undersigned, on behalf of the FTX Recovery Trust, respectfully requests that the Proposed Order, substantially in the form attached hereto as **Exhibit A**, be entered at the Court's earliest convenience.

Dated: July 1, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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